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**BEFORE THE ARIZONA CORPORATION COMMISSION
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Docket No. T-00000B-97-0238

**IN THE MATTER OF THE U S WEST)
COMMUNICATIONS, INC.)
COMPLIANCE WITH SECTION 271)
OF THE TELECOMMUNICATIONS)
ACT OF 1996)**

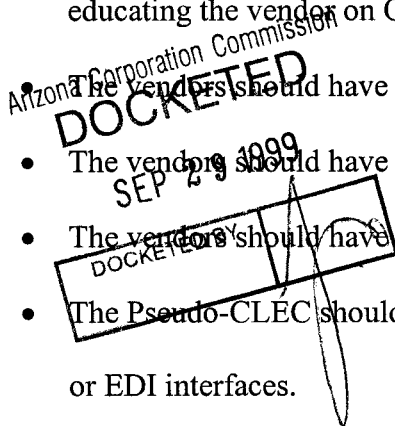
**U S WEST'S COMMENTS AND
POSITION STATEMENT
REGARDING VENDOR
SELECTION AND
WORKSHOP ISSUES**

U S WEST, by its counsel, respectfully submits its comments and position statement regarding the criteria that should be used to select a Third Party Consultant and in response to issues raised in comments regarding performance measures.

I. CRITERIA FOR VENDOR SELECTION

U S WEST does not recommend the selection of any particular vendor. Nor will U S WEST comment on the submissions of particular vendors. However, U S WEST would like to offer some suggestions on the criteria that should be used to select a Third Party Consultant and a Pseudo-CLEC.

- It is important that the vendors have testing experience. Specifically, the vendors should have experience in participating in OSS testing. If an inexperienced vendor is selected, too much time and energy will be expended educating the vendor on OSS and testing issues.
- The vendors should have staff available with experience in OSS testing.
- The vendors should have experience in project management.
- The vendors should have experience in regulatory proceedings.
- The Pseudo-CLEC should have experience developing CLEC or RBOC GUI or EDI interfaces.



- The Third Party Consultant should have general audit experience.
- The Third Party Consultant should have experience in results analysis.
- The vendors should have knowledge of and expertise in telephony.
- The vendors should have knowledge of and preferably participated in developing national standards, including platform standards, architecture, messaging standards and functional standards.
- The prices proposed by the vendors should be reasonable.

II. RECOMMENDATIONS RECENTLY ISSUED BY THE FCC STAFF

On September 27, 1999, Lawrence E. Strickling, Chief of the Common Carrier Bureau of the Federal Communications Commission sent a letter to Nancy Lubamersky, Executive Director of Regulatory Planning at U S WEST. In that letter, Mr. Strickling memorialized the suggestions that the FCC staff had given to U S WEST regarding the subjects that should be included in OSS testing. A copy of Mr. Strickling's letter is attached as Exhibit A.

A comparison between the Master Test Plan and Mr. Strickling's letter demonstrates that the Master Test Plan issued by the ACC staff incorporates all of the suggestions contained in Mr. Strickling's letter.

1. Performance Measure Evaluation

The FCC staff's first suggestion is that the test include "[a] thorough and well-documented independent assessment of the data collection and calculation processes for performance data." The FCC staff's suggestions regarding testing of performance measures are already incorporated in the Master Test Plan. The Performance

Measurement Evaluation (Section 8) will demonstrate whether U S WEST is properly collecting data and collecting performance measurement results.

2. Change Management Test

The FCC staff suggests that the testing include:

an independent review of a BOC's change management process and procedures as well as its implementation of these procedures. The change management test should provide information which can be used to evaluate the methods and procedures that the BOC employs to communicate with CLECs regarding OSS system performance and systems updates.

The FCC staff's suggestions regarding testing of change management are already included in the Master Test Plan. The Change Management Test (Section 7) is a "process test to ensure that U S WEST's system and/or process change control methods are appropriately conducted and communicated to CLECs effectively, based on the defined change control procedures."

3. xDSL Testing

The FCC staff suggests that the testing include "significant volumes of xDSL orders (i.e., xDSL capable loops)." As U S WEST has made clear during the workshops, it has no objection to including scenarios for xDSL capable loops in the Master Test Plan.

4. Normal, High, and Stress Volume Testing

The FCC staff suggests that the test include "projected normal and high volumes of pre-order and order transactions that flow-through the BOC's systems." The FCC staff defines flow-through transactions as those that are:

transmitted electronically (i.e. with no manual intervention) through the gateway into the incumbent LEC's ordering systems. Order flow-through applies solely to the OSS ordering function, not the OSS provisioning system. In other words, order flow-through measures only how the competing carrier's order is transmitted to the incumbent's back office ordering system, not how the incumbent ultimately completes that order.

The FCC staff suggests that the testing “replicate CLEC expected ordering patterns by including, for instance, error conditions and change orders, and by covering the process end-to-end.”

The Functionality Test, Section 4, encompasses these suggestions. The test will include scenarios for those products that flow through U S WEST’s ordering systems, and those scenarios will be tested end-to-end. Those scenarios will include error conditions and change orders.

The FCC staff also suggests a capacity or stress test of the systems, which is included in Section 6, Capacity Test, of the Master Test Plan.

5. Pseudo-CLEC

The FCC staff suggests that a Pseudo-CLEC be used to demonstrate the ease and efficiency of building an interface and to “ensure that these systems are capable of submitting and receiving valid transactions.” The Master Test Plan includes these suggestions. The Master Test Plan sets forth that a Pseudo-CLEC to build an interface which will be used for the Functionality and Capacity Tests, and that testing will demonstrate that the interface is capable of submitting and receiving valid transactions. Section 9.5 of the Master Test Plan includes the additional step of the Pseudo-CLEC “documenting the relative ease or complexity of creating the interface.”

III. U S WEST’S REPLY TO COMMENTS ON PERFORMANCE MEASURES

U S WEST will respond to the comments of AT&T/TCG and one point separately.

A. Response to AT&T/TCG Comments

GA-1 Gateway Availability

AT&T/TCG suggest that "U S WEST should be required to report the scheduled time that its interfaces are available to CLECs through the human-to-computer and computer-to-computer interfaces as well as to its retail operations."¹ In reply, U S WEST publishes the scheduled time that its interfaces are available to CLECs in its SGAT, paragraph 12.2.3. These scheduled times equal or exceed the time periods that U S WEST's retail operations are open for business. Measurement GA-1 measures the percentage of time the gateway is available during the scheduled time.

PO-1 Pre-Order/Order Response Times

AT&T/TCG list a number of questions and items they believe should be provided in the details of this performance indicator. In reply, U S WEST has clearly defined this indicator in Exhibit B of the SGAT, including a description of the purpose, description, and formula, as well as a list of all pre-order/order transactions that are separately measured and reported. This description is sufficient for CLECs to know what is being measured and, for test purposes, to determine whether it is being measured. With respect to questions about precisely how this indicator is being measured, the Master Test Plan, Section 8, is already designed to test U S WEST's performance indicators in a manner that will cover the questions raised.

OP-1, OP-2, MR-1, and MR-2 Speed of Answer and Percent Answered within 20 Seconds for Interconnect Provisioning and Maintenance Centers

Again, AT&T/TCG pose a number of questions, such as whether an answer consists of a live operator answering or just voicemail.² These measurements measure the time it takes for a call to be answered by a person, not a machine. The Master Test

¹ Paragraph VI.A., p. 30, AT&T and TCG's Comments on Proposed Master Test Plan, Docket No. T-00000B-97-0238, September 17, 1999.

² For performance indicators OP-1, OP-2, MR-1, and MR-2, an answer is considered to be by a "live" attendant.

Plan, Section 8, will test the veracity of these assertions and evaluate other questions, such as those raised by AT&T/TCG, as to whether U S WEST's approach is satisfactory.

OP-3 Installation Commitments Met

1. AT&T/TCG complain that this performance indicator measures the number of orders completed on the original due date, stating that the measurement would not count situations in which CLECs or U S WEST make changes to the due date. In reply, this performance indicator focuses on the degree to which U S WEST installs service when it says it will. The measurement covers all orders for which U S WEST makes a commitment to provide service by a specified date, including CLEC- or customer-requested due dates beyond the standard interval. U S WEST is puzzled as to why AT&T/TCG might want U S WEST to count as met a situation in which U S WEST changed the due date. Instead, U S WEST's performance indicator counts as a miss any U S WEST change in the due date that is later than what was originally committed.

2. AT&T/TCG also expressed concern about commitments missed for CLEC reasons being counted as met for purposes of this indicator. They stated that this "unfairly benefits U S WEST." To the contrary, counting a CLEC-caused miss as a met is consistent with the manner in which U S WEST measures retail commitments met. As long as both sides of the comparison are measured the same way, the fairness of the comparison is maintained.

OP-4 Installation Interval

1. AT&T/TCG refer to on-stand, oral testimony Mr. Williams provided in Nebraska recently. At the same time, they refer to U S WEST's Arizona SGAT and note that it does not contain the same detail about whether orders held for facility reasons are included in this performance measurement. The data U S WEST filed in Nebraska is consistent with what Mr. Williams explained there. Correspondingly, the data U S WEST has filed in Arizona is consistent with what U S WEST has filed here. Specifically, the performance results U S WEST has filed in Arizona for OP-4, Installation Interval, include orders that were held for facility reasons.

However, since the time U S WEST filed its application in Arizona, it has become apparent that it would be more useful for the installation interval measurement to be more consistent with (1) the requirements of the Act and (2) the processes and standard intervals U S WEST applies to products for which this measurement is reported. Specifically, for example, the Act requires U S WEST to provide CLECs with access to unbundled loops, but not necessarily to loops that are not, as yet, built (as sustained by the Eighth Circuit Court opinion on this subject). Secondly, U S WEST's standard intervals for unbundled loops are not defined for cases without facilities available. Accordingly, it would be appropriate for U S WEST to exclude orders held for facility reasons from OP-4, Installation Interval, when reported for unbundled loops. On the other hand, for resale services (where there is a retail comparative) and for interconnection services (where there is the obligation to build facilities, if necessary), it is appropriate to include orders held for facilities in this measurement. In this context, U S WEST will amend it's Arizona SGAT, Exhibit B, OP-4, with details consistent with these principles and to report results for the OP-4 indicator accordingly.

2. Next, again referring to Mr. Williams' testimony in Nebraska, AT&T/TCG erroneously allege that U S WEST is excluding customer-requested due dates beyond the standard interval only for CLEC orders but not for retail orders. This is simply not true. Consistent with its SGAT, Exhibit B, in both Arizona and Nebraska, U S WEST excludes customer-requested due dates beyond the standard interval for both CLEC orders and retail orders. This measurement must focus on U S WEST's performance and the resulting intervals, not on some lengthening of intervals caused by CLEC or customer requests.³

³ AT&T's confusion on the issue of U S WEST's handling of customer-requested due dates beyond the standard interval apparently arose in its misunderstanding of some anecdotal retail information supplied in Nebraska by U S WEST witness, Mr. Robert Brigham. That information, which clearly was not included with Mr. Williams' reporting of U S WEST's performance measurements, did include customer-requested due dates beyond the standard, which fact was clearly stated. Again, it was anecdotal information that was offered for a specified purpose that Mr. Brigham explained in his testimony.

AT&T's accusations of "data chicanery" and "data tricks"⁴ are groundless and, particularly in the context of these workshops which are pursuing testing that will verify the appropriateness and accuracy U S WEST's measurements, such mud-slinging is totally inappropriate.

3. Finally, AT&T/TCG imply that U S WEST is "throwing away data through exclusions."⁵ They suggest additional disaggregations. U S WEST's list of service performance indicators has been arrived at after intense negotiations with CLECs since the Act and in-depth review of FCC orders. The scope of the list of measurements in the Master Test Plan and the depth of disaggregation represents a good balance between benefit and burden, as advocated by the FCC:

In developing our proposed performance measurements and reporting requirements, we have sought to balance our goal of detecting possible instances of discrimination with our goal of minimizing, to the extent possible, burdens imposed on incumbent LECs.⁶

Further disaggregation or more performance measurements are not needed in order to avoid "throwing away data." To automatically assume that everything will need further scrutiny and thus create additional disaggregations or measurements in advance is unnecessary and wasteful. Instead, reasonable retention periods for the raw data underlying the performance measurements will support any reasonable need for additional investigation should a particular performance result call for it.

OP-5 Installation Trouble Reports

Yet again, AT&T/TCG refers to Mr. Williams' testimony in Nebraska and attempts, incorrectly, to apply it to Arizona. The performance results that U S WEST has reported in Arizona for this measurement are consistent with the definition in both the SGAT, Exhibit B, and in the Master Test Plan. Specifically, the installation troubles percentage is calculated by dividing the total number of trouble reports received within

⁴ AT&T/TCG Comments, p. 36.

⁵ Ibid.

⁶ Notice of Proposed Rulemaking, In the Matter of Performance Measurements and Reporting Requirements for Operations Support Systems, Interconnection, and Operator Services and Directory Assistance, CC Docket No. 98-56 RM-9101, ¶36 (rel. Apr. 17, 1998).

30 days of installation divided by the total number of orders installed in that month (reporting period). In any event, once again, the Master Test Plan is adequately designed to validate both what is being measured and how it is being done.

OP-7 Coordinated Cutover Interval – Unbundled Loop; OP-8 Coordinated Number Portability Timeliness; and OP-9 Combined Coordinated Cutover Interval – Unbundled Loop and Interim Number Portability

AT&T/TCG observes that there are no performance measurements addressing whether loop conversion activity starts and completes within the scheduled window of time, whether U S WEST calls the CLEC to let it know about completion of the conversion, and whether switch translations have been removed only after the loop has been converted and the customer's number ported.⁷ These assertions appear to ignore the defined nature of such cutovers as being "coordinated." By definition, such loop conversions are done only with U S WEST and CLEC in close communication. Clearly, this is a dynamic environment, in which the goal is to minimize service disruption to the customer. Accordingly, in order to accomplish this, U S WEST and CLEC need and use reasonable flexibility in adjusting the cutover window in order to ensure that everything happens in the proper order. For example, if the CLEC needs a little more time to complete its side of a conversion, that may be easily accommodated (but not so easily measured) to permit the cutover to happen virtually transparently to the customer. In such a case, the coordination process itself, with active involvement of CLEC and U S WEST, replaces the usefulness of a measurement.

MR-3 through MR-8 Maintenance and Repair Measurements

AT&T/TCG once again suggest disaggregating data and/or new measurements to address a concern that, in this case, happened in the New York collaborative process. They state, "The third party tester reviewed Bell Atlantic processes and data and discovered that CLEC troubles were disproportionately being coded to causes not attributable to Bell Atlantic . . . ," and then suggest that trouble reports excluded be separately measured. To the contrary, the New York test illustrates the fact that, without

⁷ On page 39, AT&T/TCG provide only anecdotal information, with no reference to tangible evidence and no opportunity to examine whether the situations mentioned fit the description of coordinated cutovers that these measurements address.

disaggregation and separate reporting, the third party tester can “review processes and data” and confirm or deny such concerns – without creating any new disaggregations or measurements. The Arizona Master Test Plan is well designed to accomplish this in the very process of evaluating the maintenance and repair measurements as currently defined.

CP-1 Collocation Provisioning Installation Commitments Met

U S WEST adopts the same suggestions and responses made for OP-3 above as the response for CP-1.

DPO-2 Pre-Order/Order LSR Rejection Notice Interval

AT&T/TCG propose that this measurement be reported in hours and minutes, rather than in whole business days. In reply, it is meaningless to report a measurement in a level of detail that is more finite than the underlying process being measured. The fact is that U S WEST's processes deal with orders that do not electronically flow-through. For orders that flow-through, the flow-through measurement applies. For those that do not, the process is more consistent with a measurement that reports each event in terms of integer days.

Average Interval Offered

AT&T/TCG suggests adding this measurement to the list. In reply, average intervals delivered, as measured by OP-4, in conjunction with commitments met, provide a reasonable reflection of the timeliness of U S WEST's service installation performance.

Jeopardy Notification Measurements

AT&T/TCG recommends adding a measurement to the test plan. If there is no process to measure, adding a measurement accomplishes nothing.

B. Responses to One Point Comments

Service Due Date Quoting (Average Intervals), Service Due Date Fulfillment (Average Intervals), Interval Ranges (longest due date comparisons)

One Point proposes to incorporate testing of these aspects of provisioning. In reply, U S WEST agrees with the average interval approach, in general. In combination with measuring commitments met (OP-3), the Master Test Plan adequately address One

Point's suggested dimensions by measuring installation intervals (OP-4). With respect to interval ranges, standard deviations provide a generally-acceptable measure of variability of data.

Speed of Transactions

One Point suggests measuring "parity" in speed of transactions. In reply, U S WEST notes that the Master Test Plan, Appendix B, includes PO-1, Query/Response, measurements that compare speed of transactions.

Measurement of Successful Service Order Completions

One Point suggests evaluating, in addition to due date fulfillment statistics, the percentage of service orders that actually have dial tone on the service date. In response, it should be noted that the Master Test Plan includes the "Installation Troubles" measurement that will capture situations in which there is not dial tone after the service is supposed to be working.

Number, Speed, and Ease of Escalations

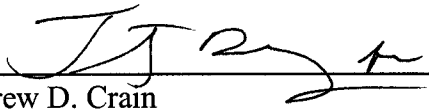
One Point suggests that these should be evaluated in the test plan. In reply, no other test in the industry has found this necessary, nor has the FCC identified them as necessary.

Telephone Number Changes

One Point suggests that this should be evaluated in the test plan. In reply, no other test in the industry has found this necessary, nor has the FCC identified this as necessary.

Dated: September 29, 1999.

Respectfully submitted,

By:  _____

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